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**From:** Greenberg, Ken [Greenberg.Ken@epa.gov]  
**Sent:** 3/7/2014 7:28:26 PM  
**To:** Karlson, Kristine [Karlson.Kristine@epa.gov]  
**Subject:** FW: Armstrong Chicken Ranch  
**Attachments:** Armstrong\_Environmental\_Complaint.pdf; Armstrong\_October\_2008\_Inspection.pdf;  
Armstrong\_December\_2008\_Inspection.pdf

Kristine – I'm going to send you a few e-mails with information about the Armstrong Egg Farm in San Diego County adjacent to the San Pasqual Tribal land. We will be joining the Regional Water Quality Control Board on an inspection of the farm sometime in the next couple of weeks. Please review this material and then we can discuss whether or not you can do this inspection.

There are two water issues of concern to the Tribe – 1. control of wastewater/storm water discharges and 2. Possible contamination of their drinking water sources.

What I found;

1. Drinking Water - Water Division checked it out and found no contamination in the tribe's public water supply (combination of wells on tribal land and piped water from neighboring Valley Center PWSS). However, 3 of the tribes wells located closest to the egg farm have nitrates above the MCL. These 3 wells are currently used only for irrigation but the tribe is considering using them as part of its drinking water supply.

2. Wastewater - the chicken ranch has been operating under a conditional waiver from the Regional Water Quality Control Board which means that RWQCB concluded they're not discharging and therefore don't need a discharge permit. However, in a 2008 inspection the Board observed evidence of discharge, issued an NOV and asked the ranch to apply for a discharge permit. For some reason the ball was dropped and the RWQCB never issued a permit. Because it's been a few years since ball was dropped, RWQCB agreed that they'll go out now to inspect and determine anew if a discharge permit is needed. We will join the RWQCB on this inspection. We also found in RWQCB documents that in 2007 San Diego County storm water inspectors observed process wastewater discharge from the egg farm to the county storm drains and issued a warning to the egg farm. (see attached files with 2008 complaint lodged with RWQCB.)

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**From:** Sakamoto, Glenn  
**Sent:** Monday, February 24, 2014 1:05 PM  
**To:** Greenberg, Ken  
**Subject:** FW: Armstrong Chicken Ranch

Ken – Here is the final response from RWQCB, San Diego office, on the background of Armstrong Chicken Ranch.

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**From:** Mata, Michelle@Waterboards [<mailto:Michelle.Mata@waterboards.ca.gov>]  
**Sent:** Monday, February 24, 2014 12:07 PM  
**To:** Sakamoto, Glenn  
**Cc:** Outwin, Brandi@Waterboards; Barker, David@Waterboards  
**Subject:** Armstrong Chicken Ranch

Hello Glenn,

Here is a summary of my findings for Armstrong Egg Ranch (Facility):

- The Facility is not covered under an NPDES/WDR permit, however, they are enrolled under a San Diego Water Board conditional waiver for discharges from animal operations. The Conditional Waivers expired February 3, 2014. The San Diego Water Board is in the process of renewing the waivers.
- The Conditional Waiver does not require groundwater monitoring, therefore we do not have any nitrate data. You should contact: Tom Lambert, County of San Diego Department of Environmental Health. I previously sent you his contact information.
- Our records indicate the Facility has over 300,000 hens; based on available information it appears Armstrong Chicken Ranch is a CAFO under 40 CFR 122.23 criteria.
- In October 2008, the San Diego Water Board received an Environmental Complaint and Petition for Enforcement from the Humane Society of the United States (attached). The complaint alleged that the Facility was illegally discharging wastewater into storm drains and onto the neighbors land and requested the San Diego Water Board initiate an investigation.
- An inspection was conducted in October 2008 (attached). In summary, the inspection report states that the Facility was not in compliance with the conditional waiver. Although there were no discharges at the time of the inspection, there was evidence of previous discharges. In addition, the Facility did not have adequate BMPs to ensure process wastewater didn't leave the site or to prevent storm water from coming into contact with manure piles.
- In November 2008, the San Diego Water Board issued a Notice of Violation to the Facility for the failure to comply with the San Diego Water Board Basin Plan Prohibitions and Conditional Waiver Requirements.
- In December 2008, the San Diego Water Board conducted a follow-up inspection of the Facility (attached). The inspection report states that the facility had implemented temporary BMPs and management measures to prevent discharges from flowing onto adjacent properties or to the storm water conveyance system. The report also notes that the San Diego Water Board was considering issuing individual WDRs to the Facility.
- In March 2009, the San Diego Water Board sent a letter to the Facility requesting the submittal of a Report of Waste Discharge (ROWD). I was not able to locate a ROWD in our records. The March 2009 letter did not indicate a deadline for submittal.
- In March 2010, the County of San Diego Agriculture, Weights, and Measures staff conducted an inspection of the Facility and indicated (in an email to the San Diego Water Board) that the owner of the Facility was waiting for grant funding to proceed with engineering designs and construction of additional facilities. This is the last correspondence in our files.

Next steps:

The San Diego Water Board plans to conduct an inspection of the Facility in the near future (date TBD). Please let me know if you (or someone in your office) are interested in attending. We will also be following up on the status of the ROWD.

Feel free to contact me if you have any questions or would like to discuss further.

Respectfully,

Michelle Mata  
Water Resource Control Engineer  
2375 Northside Drive, Suite 100  
San Diego, CA 92108-2700  
(619) 521-3369

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

This Email message contained an attachment named  
image001.jpg

which may be a computer program. This attached computer program could contain a computer virus which could cause harm to EPA's computers, network, and data. The attachment has been deleted.

This was done to limit the distribution of computer viruses introduced into the EPA network. EPA is deleting all computer program attachments sent from the Internet into the agency via Email.

If the message sender is known and the attachment was legitimate, you should contact the sender and request that they rename the file name extension and resend the Email with the renamed attachment. After receiving the revised Email, containing the renamed attachment, you can rename the file extension to its correct name.

For further information, please contact the EPA Call Center at (866) 411-4EPA (4372). The TDD number is (866) 489-4900.

\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*